

## Danner, Ward

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**From:** Scott, Jeff  
**Sent:** Wednesday, June 18, 2014 11:20 AM  
**To:** John, Steven; Penny Newman  
**Cc:** Armann, Steve; Huettelman, Tom; Mogharabi, Nahal; Nurre, Deirdre; Jennifer DENICOLA; slyon@smmusd.org  
**Subject:** RE: Malibu

Penny-

Thanks for your inquiry. Let me just add a little more to Steven's response in the hope that it's helpful. As Steven refers to below, there's been a misunderstanding regarding what EPA provided to the District in the way of input. Last week we provided input for the cleaning and testing of the classrooms in the near term. The cleaning is designed to remove dust to prevent potential exposures. The sampling is to determine what levels of PCBs are present in the air and in terms of dust. We feel it is important for that work to move forward.

The district still owes us a plan for the remediation effort by July 4th. People were getting confused that our comments on the near term effort were an approval of the remediation plan - which is not true. That plan will be made available for our review and the review of others. I had a good call with Jennifer DeNicola yesterday afternoon to clarify this. I'll also attach below a copy of an e-mail that Steve Armann sent to Jennifer earlier that reviews this in more detail.

I hope this is helpful. Feel free to contact Tom Huettelman or Steve Armann if you would like more detailed information. If you attend, I will look forward to seeing you on Friday.

Best

Jeff

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From: Armann, Steve  
Sent: Wednesday, June 18, 2014 7:11 AM  
To: Jennifer DENICOLA  
Cc: Scott, Jeff; Huettelman, Tom  
Subject: Concurrence on District's Sampling Plan

Jennifer, Last night Jeff asked me to follow up with you regarding the status of the required cleanup plan and the recently "approved" sampling plan. Below, I've outlined where we are with the District. Please call if you have any questions or we can talk on Friday. Thanks.

- On June 4, 2014 we submitted comments to the District on their General Plan (Plan) to address PCBs at schools within the Santa Monica Malibu Unified School District. The transmittal letter to the Plan outlined how the District intended to apply the Plan at Malibu High School. The Plan and the transmittal memo were inadequate in meeting the TSCA requirements for a cleanup plan to address caulk containing PCBs greater than 50 ppm at MHS. In our comments we requested the District submit a Malibu High School specific plan that meets the requirements of TSCA, including the required certifications under 40 CFR 761.61(a).
- Our comment letter also recommended that the District move forward with the "Building Material Inspection Plan" and the "PCB Best Management Practices" sections of the Plan after consideration of our comments. These activities do not require EPA approval.

- We requested that the MHS specific plan and District-wide plan be submitted to us by July 4, 2014. We said we will approve the MHS plan and provide comments on the District-wide plan.
- Last week the District submitted a sampling plan and, after comments, we concurred with their approach. The plan is to conduct air and wipe samples prior to and after implementation of the BMP to demonstrate effectiveness of the BMPs. Our concurrence was requested in order to facilitate monitoring and implementation of the BMPs during the current summer break. The District will need to submit a revised sampling plan to address long term monitoring of the caulk known to be above 50 ppm.
- We expect that the MHS specific PCB cleanup plan due July 4, 2014 will include at least (1) a proposed schedule for removal of the caulk greater than 50 ppm; (2) proposed monitoring plan to ensure air and surfaces are protective during the period before removal and immediately after removal of the caulk; (3) proposed surface wipe health based cleanup standards; (4) proposed process for decontamination of substrate in contact with PCB containing caulk, and (5) proposed pilot studies to evaluate frequency of BMPs.

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-----Original Message-----

From: John, Steven  
 Sent: Tuesday, June 17, 2014 1:31 PM  
 To: Penny Newman  
 Cc: Scott, Jeff; Armann, Steve  
 Subject: RE: Malibu

Hi Penny -- it's my understanding that EPA has concurred on the sampling plan, not the entire Environ plan. There will definitely be an opportunity on Friday for more conversation about where things stand with regards to the proposed work at Malibu High School and for the stakeholders to have the opportunity to detail their concerns and preferences for how to move forward. Jared and the team from EPA R9 are wanting to have an open and frank dialog on Friday about what can and what should happen at Malibu High School. Please share with Jared any concerns you have if EPA has not been coordinating with you and the parent and teacher stakeholders adequately, or any other concerns about EPA's involvement in this issue.

Thank you for reaching out to me with your concerns.

Steven

-----Original Message-----

From: Penny Newman [<mailto:penny.newman@ccaej.org>]  
 Sent: Tuesday, June 17, 2014 12:54 PM  
 To: John, Steven  
 Subject: Malibu

Hi Steven, I just heard that EPA has signed off on the environ plan without any public input! This before Jared's coming to meet! I dot ft this. You all make it so hard to help you. Penny Sent from my iPhone